

COHEN MILSTEIN SELLERS & TOLL PLLC

Daniel S. Sommers

Michelle C. Yau

1100 New York Avenue,

N.W. Suite 500, West Tower

Washington, D.C. 20005

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LAURENCE KAPLAN, on behalf of
himself, individually, and on behalf of all
others similarly situated,

Plaintiff,

vs.

SAINT PETER'S HEALTHCARE
SYSTEM, RONALD C. RAK, an
individual, SUSAN BALLESTERO, an
individual, GARRICK STOLDT, an
individual, and JOHN and JANE DOES,
each an individual, 1-20,

Defendants.

)

)

) Civil Action No. 3:13-cv-02941-MAS-

) TJB

)

)

) Electronically Filed

)

)

)

)

)

)

)

)

MOTION TO WITHDRAW AS ATTORNEY

Pursuant to Local Rule 102.1, the undersigned attorneys hereby respectfully move the Court for an order to withdraw Scott M. Lempert of Cohen Milstein Sellers & Toll, PLLC as counsel of record for Plaintiffs in the above-captioned matter, as Mr. Lempert has left the employ of Cohen Milstein Sellers & Toll, PLLC.

Plaintiffs will continue to be represented in this matter by counsel from Cohen Milstein

Sellers & Toll, PLLC and Keller Rohrbach, L.L.P., indicated on the below signature block.

Dated: November 22, 2022

Respectfully submitted,

/s/ Daniel S. Sommers

Daniel S. Sommers

Michelle C. Yau

COHEN MILSTEIN SELLERS & TOLL, PLLC

1100 New York Avenue, N.W. Suite 500, West

Tower Washington, D.C. 20005

Tel: (202) 408-4600

Fax: (202) 408-4699

Email: dsommers@cohenmilstein.com

myau@cohenmilstein.com

KELLER ROHRBACK L.L.P.

Lynn Lincoln Sarko

Matthew M. Gerend

1201 Third Avenue, Suite 3200

Seattle, WA 98101

Tel: (206) 623-1900

Fax: (206) 623-3384

Email: lsarko@kellerrohrback.com

mgerend@kellerrohrback.com

and

KELLER ROHRBACK P.L.C.

Ron Kilgard

3101 North Central Avenue, Suite 1400

Phoenix, AZ 85012

Tel: (602) 248-0088

Fax: (602) 248- 2822

Email: rkilgard@kellerrohrback.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LAURENCE KAPLAN, on behalf of)	
himself, individually, and on behalf of all)	
others similarly situated,)	Civil Action No. 3:13-cv-02941-MAS-
)	TJB
Plaintiff,)	
vs.)	
)	Electronically Filed
SAINT PETER'S HEALTHCARE)	
SYSTEM, RONALD C. RAK, an)	
individual, SUSAN BALLESTERO, an)	
individual, GARRICK STOLDT, an)	
individual, and JOHN and JANE DOES,)	
each an individual, 1-20,)	
)	
Defendants.)	
)	
)	
)	

**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW AS
ATTORNEY**

Upon consideration of the filed Motion to Withdraw as Attorney for Plaintiffs by Scott M. Lempert, it is hereby:

ORDERED that the Motion to Withdraw as Attorney is **GRANTED**. Attorney Scott M. Lempert is hereby withdrawn as counsel of record in this matter.

DATED this ____ day of November 2022.

The Honorable Michael Shipp
United States District Judge